

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In RE:	)	
	)	Case No. 20-10979-MDC
IRA L. GRIFF,	)	
	)	Chapter 13
Debtors.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	
Movant,	)	
	)	
v.	)	
	)	
IRA L. GRIFF,	)	
	)	
Respondent.	)	
	)	

**UNITED STATES' MOTION TO EXTEND  
TIME TO FILE NONDISCHARGEABILITY COMPLAINT, IF NECESSARY**

The United States of America, on behalf of the Social Security Administration (“SSA”), files this Motion to Extend Time to File Nondischargeability Complaint, If Necessary, pursuant to Fed.R.Bankr.P. 4004(b) and 9006(b), and in support thereof states as follows:

1. Debtor, Ira L. Griff, filed a Chapter 13 bankruptcy petition on February 18, 2020.

Dkt. No. 1.

2. SSA is listed as a creditor of debtor-respondent in his Petition. The amount of the debt listed by debtor-respondent as owed to SSA is \$48,770.00. *See* Dkt. No. 1, at p. 26.

3. The deadline to object to debtor-respondent’s discharge or to challenge dischargeability of certain debts is June 7, 2020.

4. The United States is in the process of investigating SSA’s claim against debtor-respondent, for the purpose of determining whether the debt owed to SSA resulted from

debtor-respondent's misrepresentations, if any, precipitating benefits to which he was not entitled.

5. In order to make a decision on whether an adversary proceeding is warranted, it will be necessary to review a number of documents retained only in hard copy, which contains documents related to Debtor. However, due to Covid-19 precautions, counsel is unable to access the paper file, as the result of restricted access to SSA facilities.

6. Given the above, and in order to make a proper determination regarding filing an objection to the dischargeability of SSA's specific debt, the Office of the General Counsel for SSA is requesting additional time to determine whether a complaint is appropriate.

7. Counsel for SSA has contacted Debtor's counsel, David M. Offen, Esquire, who has no objection to this motion.

8. Accordingly, it is respectfully requested that the United States be granted a ninety (90) day extension to complete its review and file an adversary complaint, if needed.

WHEREFORE, the United States of America respectfully requests that this Honorable Court issue an Order extending the deadline to file objections to discharge for ninety (90) days from the deadline of June 7, 2020.

May 14, 2020

Respectfully submitted,

WILLIAM M. McSWAIN  
United States Attorney

/s/ Timothy Reiley  
Timothy Reiley  
Special Assistant United States Attorney  
c/o Social Security Administration  
Office of the General Counsel  
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*Counsel for United States of America, SSA*

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\_\_\_\_\_

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2020 it is hereby ORDERED,  
ADJUDGED, and DECREED that the United States of America's Motion to Extend Time to File  
Nondischargeability Complaint, If Necessary, is GRANTED. The United States shall file any  
objection to discharge on or before ninety (90) days of the current deadline of June 7, 2020 or  
September 5, 2020.

BY THE COURT,

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Motion for Extension of Time was served by electronic noticing (ECF) and/or UPS prepaid, this 14 May 2020 day of May, 2020, upon:

**David M. Offen**  
The Curtis Center  
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**Ira L. Griff**  
3620 Rayland Road  
Philadelphia, PA 19154

**Trustee**  
**William C. Miller**  
Chapter 13 Trustee  
P.O. Box 1229  
Philadelphia, PA 19105  
(215) 627-1377  
[ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

/s/ Timothy Reiley  
Timothy Reiley  
Special Assistant United States Attorney